

BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION
STATE OF FLORIDA

INQUIRY CONCERNING A JUDGE,
NUMBER 04-53, ALAN C. TODD.

CASE NUMBER SC04-1655

**THE HONORABLE ALAN C. TODD'S ANSWERS TO THE
JUDICIAL QUALIFICATIONS COMMISSION'S
FIRST SET OF INTERROGATORIES**

The Honorable Alan C. Todd files this his Answers to the Judicial
Qualifications Commission's First of Interrogatories.

**CERTIFICATE OF TYPE, SIZE, STYLE
AND ANTI-VIRUS SCAN**

I HEREBY CERTIFY that the Answers to the Judicial
Qualifications Commission's First Set of Interrogatories is submitted in 14-point,
proportionately spaced, Times New Roman font; and that the accompanying
computer disk has been scanned and found to be free of viruses by Norton Anti-
Virus for Windows.

**CHANDLER R. MULLER, of
LAW OFFICES OF
MULLER & SOMMERVILLE, P.A.**
1150 Louisiana Avenue, Suite 2
Post Office Box 2128
Winter Park, Florida 32790-2128
Telephone: (407)647-8200
Facsimile: (407)645-3000
Florida Bar Number 112381

1. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 1 (including all sub-parts) of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

- 1. Deputy Mindy D. Hood
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 2. Deputy David Moore
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 3. Deputy Clerk Penny Sutton
Orange County Courthouse-Ocoee
Ocoee, Florida
(407)667-6240

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 4. Deputy Michael Richardson
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Anticipated testimony of this witness to be furnished at a later date.

5. Deputy Sgt. Worley
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Expect this witness to testify consistent with the allegations contained in the Complaint.

6. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answer and Affirmative Defenses filed herein.

7. Any and all witnesses listed, or to be listed or called by the Judicial Qualifications Committee.
8. Any and all other persons discovered or found to have information pertaining to these conversations/charges or as to any circumstances or facts surrounding or pertaining to these conversations/charges.

2. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 2 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

Yes, I intend to call any witnesses at the final hearing in this matter in connection with Paragraph 2 of the Notice of Formal charges as follows:

- 1. Deputy Mindy D. Hood
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 2. Deputy Sgt. Worley
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 3. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answer and Affirmative Defenses filed herein.

4. Any and all witnesses listed, or to be listed or called by the Judicial Qualifications Committee.
5. Any and all other persons discovered or found to have information pertaining to these conversations/charges or as to any circumstances or facts surrounding or pertaining to these conversations/charges.

3. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 3 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

Yes, I do intend to call any witnesses at the final hearing in this matter in connection with Paragraph 3 of the Notice of Formal charges as follows:

- 1. Deputy Mindy D. Hood
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 2. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answers and Affirmative Defenses filed herein.

- 3. Any and all witnesses listed, or to be listed or called by the Judicial Qualifications Committee.
- 4. Any and all other persons discovered or found to have information pertaining to these conversations/charges or

as to any circumstances or facts surrounding or
pertaining to these conversations/charges.

4. Do you intend to call any witnesses at the final hearing in this
matter in connection with Paragraph 4 of the Notice of Formal Charges? If so,
please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

Yes, I intend to call any witnesses at the final hearing in this
matter in connection with Paragraph 4 of the Notice of Formal
charges as follows:

- 1. Deputy Janet Bagley
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Expect this witness to testify consistent with the
allegations contained in the Complaint.

- 2. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answer
and Affirmative Defenses filed herein.

- 3. Any and all witnesses listed, or to be listed or called by
the Judicial Qualifications Committee.

4. Any and all other persons discovered or found to have information pertaining to these conversations/charges or as to any circumstances or facts surrounding or pertaining to these conversations/charges.

5. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 5 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

Yes, I intend to call any witnesses at the final hearing in this matter in connection with Paragraph 5 of the Notice of Formal charges as follows:

1. Deputy Janet Bagley
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Expect this witness to testify consistent with the allegations contained in the Complaint.

2. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answer and Affirmative Defenses filed herein.

3. Any and all witnesses listed, or to be listed or called by the Judicial Qualifications Committee.

4. Any and all other persons discovered or found to have information pertaining to these conversations/charges or as to any circumstances or facts surrounding or pertaining to these conversations/charges.

6. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 6 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

Yes, I intend to call any witnesses at the final hearing in this matter in connection with Paragraph 6 of the Notice of Formal charges as follows:

- 1. Deputy Janet Bagley
Orange County Sheriff's Office
Orlando, Florida
(407)836-6060

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 2. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answer and Affirmative Defenses filed herein.

- 3. Any and all witnesses listed, or to be listed or called by the Judicial Qualifications Committee.
- 4. Any and all other persons discovered or found to have information pertaining to these conversations/charges or as to any circumstances or facts surrounding or pertaining to these conversations/charges.

7. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 7 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

- 1. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answer and Affirmative Defenses filed herein.

8. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 8 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

Yes, I intend to call any witnesses at the final hearing in this matter in connection with Paragraph 8 of the Notice of Formal charges as follows:

- 1. Trial Clerk Sara Jones
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2079

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 2. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answer and Affirmative Defenses filed herein.

- 3. Any and all witnesses listed, or to be listed or called by the Judicial Qualifications Committee.
- 4. Any and all other persons discovered or found to have information pertaining to these conversations/charges or

as to any circumstances or facts surrounding or
pertaining to these conversations/charges.

9. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 9 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

Yes, I intend to call any witnesses at the final hearing in this matter in connection with Paragraph 9 of the Notice of Formal charges as follows:

- 1. Trial Clerk Sara Jones
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2079

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 2. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answer and Affirmative Defenses filed herein.

- 3. Any and all witnesses listed, or to be listed or called by the Judicial Qualifications Committee.
- 4. Any and all other persons discovered or found to have information pertaining to these conversations/charges or

as to any circumstances or facts surrounding or pertaining to these conversations/charges.

10. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 10 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

ANSWER:

Yes, I intend to call any witnesses at the final hearing in this matter in connection with Paragraph 10 of the Notice of Formal charges as follows:

- 1. Trial Clerk Sara Jones
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2079

Expect this witness to testify consistent with the allegations contained in the Complaint.

- 2. The Honorable Alan C. Todd
County Court Judge
Orange County Courthouse
425 North Orange Avenue
Orlando, Florida 32801
(407)836-2266

Expect this witness to testify consistent with the Answer and Affirmative Defenses filed herein.

- 3. Any and all witnesses listed, or to be listed or called by the Judicial Qualifications Committee.
- 4. Any and all other persons discovered or found to have information pertaining to these conversations/charges or

as to any circumstances or facts surrounding or
pertaining to these conversations/charges.

11. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 1 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

12. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 2 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

13. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 3 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

14. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 4 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

15. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 5 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

16. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 6 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

17. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 7 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

18. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 8 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

19. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 9 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

20. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 10 (including sub-parts) of the Notice of Formal Charges.

ANSWER:

At this time, I do not intend to rely on any documents at the final hearing in this matter.

by: _____
ALAN C. TODD

STATE OF FLORIDA)

COUNTY OF ORANGE)

The foregoing Honorable Alan C. Todd's Answers to Interrogatories were acknowledged before me this _____ day of November, 2004, by Alan C. Todd. He is personally known to me and did take an oath.

NOTARY PUBLIC – State of Florida
Printed or Typed Name: _____
My Commission expires: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the _____ day of November, 2004, a copy of the foregoing Answers to Interrogatories have been furnished by mail delivery to Lansing C. Scriven, Esq., Special Counsel for the Florida Judicial Qualifications Commission, and Thomas C. MacDonald, Jr., Esq., General Counsel for the Florida Judicial Qualifications Commission. The original Answers to Interrogatories has been furnished to the Clerk of the Supreme Court for the State of Florida for filing.

**CHANDLER R. MULLER, of
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MULLER & SOMMERVILLE, P.A.**
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